Comments Regarding:
ET Docket 01-278
RM-9375
RM-10051

January 30, 2002

To the Commissioners and Staff
Federal Communications Commission
Washington, D.C.

I am writing to express my concerns about and opposition to SAVI Technology's request to deploy unlicensed transient RF identification devices in the 70-cm amateur radio band. This would be a harmful and unnecessary degradation of important amateur radio service capabilities.

There is a serious potential that these devices would generate pervasive interference to the amateur radio service. It would be in the applicant's interest to place them on as many shipping containers, packages, and delivery vehicles as it could. The Washington Post News Service of November 27, 2001 quoted Coast Guard Commandant James Loy as reporting that "seventeen million containers come to this country every year". As of January 24, 2002, the United Parcel Service (UPS) web site "UPS Fact Sheet" reports that it operates a delivery fleet of 88,000 vehicles, delivering 13.6 million packages and documents daily. The sheer number of unlicensed rf identification devices would create a steady barrage of signals.

SAVI attempts to explain away these problems by stating that its devices would operate in commercial areas where there are few amateurs and hence would cause no interference to amateur operation. That logic ignores at least three situations:

-- amateur weak-signal operations that would be adversely affected at great distance
-- amateur emergency communication response efforts in or near commercial areas
-- the use of rf id devices on containers as they transit the nation would produce widespread interference throughout all types of locations and communities

Amateur operations such as satellite ground reception and other weak-signal reception would be disrupted by these unlicensed transmitters. Studies by the American Radio Relay League (ARRL) indicate that if these devices were to operate at the requested power level, they would cause "substantial interference in excess of 1,000 meters from the RFID transmitter".

The SAVI proposal would also permit continuous transmissions of up to two minutes plus retransmissions in case of an error. The proposed power level and transmission times are far beyond what has been previously permitted for such unlicensed devices and exceed the threshold of what should be permitted as unlicensed devices. The ARRL believes that, under the Communications Act of 1934, devices with such substantial interference potential must be licensed.

Amateurs provide emergency communications assistance to disaster teams, police and fire departments, the Coast Guard, Red Cross, Salvation Army, and others when they respond to incidents at industrial plants, docks, or warehouses. These are the same locations where hundreds, if not thousands, of rd id devices could directly interfere with response efforts.

There appears to be limited remedy for resolving interference caused by the rf identification devices. Their huge number and transient locations would make it difficult to track down and eliminate offending devices.

As the Commission noted in paragraph 19 of its Notice of Proposed Rule Making and Order, rf identification systems can already operate in a number of frequency bands under Part 15. SAVI has not demonstrated that the 70-cm band is the one best-suited for this system. In fact, as of November 27, 2001, the SAVI web site states that this system **"also supports 868 MHZ applications where this frequency band is preferable".** That frequency may be the most appropriate. This activity appears related to the land mobile service, and, because of its nature, that service may also be better able to tolerate the presence of such unlicensed devices.
The applicant might also utilize one of the Industrial, Scientific and Medical (ISM) bands.

I respectfully urge to you deny SAVI's present request and to instead protect the existing amateur radio service allocations in the 70-centimeter band.

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